



## Fact Sheet on the Amended Environmental Cooperative Agreement Between 3M Company Menomonie and Wisconsin Department of Natural Resources

### A. Facility Background

3M – Menomonie (3M) provides a flexible manufacturing environment and infrastructure to enable long-term growth of existing and new businesses and rapid process development and successful commercialization of new technologies and products for 3M. The resident site management maintains responsibility for overall site management. The 3M-Menomonie facility employs approximately 500 people and occupies over 403,000 square feet in production, office, and associated warehouse space under one roof. The entire site size consists of 540 acres with a considerable portion of this land leased for agricultural production. The plant operates a variety of production shifts with several business units operating continuously. There are several major operations located within the facility. The Agreement contains a brief description of each with a description of how each operation could impact the environment.

On October 1, 2002 the Wisconsin Department of Natural Resources (DNR) and 3M signed a Cooperative Environmental Agreement (Agreement) that established general goals, targets and conditions. On December 22, 2004, following a 30-day Public Comment Period, and a review by EPA of a Title V Air Pollution Control Permit, DNR and 3M signed an Amended Agreement. The Amended Agreement (Amendment) specifies goals, targets, and conditions, and includes a Part III Title V Air Pollution Control Permit.

In the past, 3M – Menomonie facility operated as one facility with many divisions. Each separate operation required individual permits for construction and operation often times requesting premature permits that never were utilized, thus creating unnecessary workloads for both parties. Under the Environmental Cooperation Pilot Program, and pursuant to Section 299.80, Wis. Statutes, DNR and 3M have agreed to test initiatives that focus, in part, on a well designed Environmental Management System to assist in establishing and tracking objectives and targets. In addition, DNR and 3M agreed to conditions that establish a total facility air emissions cap, and stringent pre-approved conditions that allow 3M to respond quickly to business needs without obtaining a construction permit first. The end result is a

commitment to environmental gains while considering positive economic impacts to 3M.

### B. Environmental Policy and Performance

3M recognizes the necessity for responsible environmental management and conservation of resources. 3M has also recognized the global nature of environmental matters and the importance of industry's constructive cooperation in achieving international environmental conservation. Over the years, 3M has established a record of many significant pollution control projects at its facilities worldwide.

In 1975, 3M developed a Pollution Prevention Pays (3P) program with the goal of eliminating or reducing sources of pollution in 3M products and processes. This program has been recognized globally for its innovation in environmental management by focusing on pollution prevention, rather than pollution control. An example from 3M's 2004 annual report reflects the following:

**Total pollution prevented: 1,362 tons** (includes solid and hazardous waste and air pollutants)

**Total \$ savings: \$ 843,900**

**Total energy savings: 276,100 MMBTU**

**Green house Gas Emissions reduced: 43.3 metric ton CO<sub>2</sub> equivalent**

3M Menomonie has been ISO14001 certified since 2000. The facility is also the recipient of the Governor's Award for Hazardous Waste Reduction.

### 3M's Policy Statement

3M will continue to recognize and exercise its responsibility to:

- Solve its own environmental pollution and conservation problems.
- Prevent pollution at the source wherever and whenever possible.
- Develop products that will have a minimum effect on the environment.
- Conserve natural resources through the use of reclamation and other appropriate methods.

- Assure that its facilities and products meet and sustain the regulations of all federal, state, and local environmental agencies.
- Assist, wherever possible, governmental agencies and other official organizations engaged in environmental activities.

## **C. Commitment to an Environmental Management System**

3M has a strong Environmental Management System (EMS) that was ISO14001 certified in 2000.

To date, 3M is meeting all commitments and conditions outlined in the Agreement and the requirements under Section 299.80, Wis. Statute. These include:

- Establishing and actively involving an Interested Persons Group
- Submitting a Baseline Report and an Annual Report
- Securing a certification of their EMS from Underwriter's Laboratory

## **D. Continuous Environmental Improvement**

As a part of the EMS, 3M Menomonie has established goals and reported on progress towards:

- reducing hazardous waste levels;
- establishing and implementing an integrated contingency plan for emergency response;
- reducing VOC per pound of good output by 25% from the year 2001;
- reducing solid and chemical waste per pound of good output by 25% from the year 2001;
- reducing TRI emissions per pound of good output by 50% from the year 2001;
- doubling the number of Pollution Prevention Pays (3P) projects over the past five years; and,
- other goals established through the Environmental Management System.

## **E. Variances Granted**

This Amendment establishes a facility-wide VOC emissions cap of 249 tons per year to replace the various separate, annual emissions limits in existing permits. This is explained in more detail in the Amendment, Section X. Pollution Limits and Section XI, Operational Flexibility and Variances. 3M and DNR have also outlined specific conditions in Appendix E. Part III of Air Pollution Construction

Permit (#04-SJZ-142) and Operation Permit (# 617056660-P01) of the Amendment.

## **F. Benefits of Amendment**

The Amendment represents innovation from the current regulatory framework because it establishes a facility wide bubble permit that is over 150 tons of Volatile Organic Compound air emissions and establishes goals and objectives for reductions over time of wastes generated by the facility. In addition, the Amendment recognizes the additional work at the facility to create, implement and manage an integrated contingency plan that provides for integrated emergency response.

By setting forth interim and final limitations to be achieved by 3M in five years and beyond (contingent upon renewal), this proposal encourages technological innovation by providing 3M with the time to investigate the best methods to achieve reduction goals. In contrast, under the current regulatory environment companies often have limited time and flexibility to implement the emission control and waste reduction requirements.

This proposal will encourage 3M to establish progressively lower emissions, based upon environmental benefit that can be achieved through reductions per pound good output. 3M will also be able to investigate new emission control strategies that it would not otherwise investigate under the current regulatory environment as a part of the research and development of new products and the corresponding manufacturing processes.

The terms in this Amendment stand to test a well designed EMS and hopes to realize substantial savings of time and labor for both DNR and 3M while seeing to public safety and achieving environmental gains. The terms of the Amendment will hopefully provide economic stability for 3M and the community.

## **G. Community Involvement and Building Trust**

Under the terms of this Amendment and requirement of an ISO 14000 registration, 3M will continue to conduct yearly audits of its EMS and provide performance evaluations to the DNR. 3M will also make available to the public, information on its progress and will hold regular meetings with the interested persons group that represents the interests of the community.

## **H. For More Information**

Visit the Bureau of Cooperative Environmental Assistance website at:

<http://dnr.wi.gov/org/caer/cea/ecpp/> or contact Mark Harings at: 715/831-3263, Mark.Harings@dnr.state.wi.us